

REMARKS

Claims 1, 5, 7, 12, 16, 20, 21, 22, 23, 24, 31 and 32 have been amended by this paper.
No new matter has been added by the amendments.

Claims 1-4, 20-27 and 31 have been rejected under 35 U.S.C. § 101 as being directed to ineligible subject matter. It is submitted that the amendments to claims 1 and 20 render the rejections moot.

Claims 7-19, 28-30 and 32-36 have been rejected under 35 U.S.C. § 112, ¶ 2 as being indefinite for failing to particularly point out and distinctly claim the subject matter regarded as the invention. Claims 7, 12, 16 and 32 have been amended to remove the reference to Microsoft's WINDOWS® trademark, thereby rendering the rejections moot.

Claims 1-36 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,549,947 to Suzuki in view of U.S. Patent No. 5,630,101 to Sieffert. The rejections are respectfully traversed.

The Suzuki reference discloses a system for controlling a printer from a host computer. The system includes a printer driver that generates print data and a printer monitor that controls the printer device. Both the printer driver and the printer monitor include a graphic user interface ("GUI"). The printer driver GUI displays printer status data to the user and the printer monitor GUI displays printer errors or warnings.

Importantly, it should be noted that the Suzuki reference makes no mention of a system wherein the GUI code is maintained independent of the printer operating code by way of separate modules, thereby allowing a user to modify one code without negatively affecting the other code. Furthermore, it should be noted that the Suzuki reference makes no mention of a third independent module that includes a list of conflicts, such that the system may display a conflict from the list on the GUI in response to a predetermined condition.

The Sieffert reference discloses a system for translating image data between multiple input and output imaging devices using different communication protocols. In particular, the Sieffert reference suggests utilizing multiple, independent software components to control a number of hardware devices and separate software components to translate image data between communication protocols. Sieffert, col. 2, l. 60 - col. 3, l. 20. Components may be selected and assembled to create a communication pipeline connecting an input image device with an output

image device. The modular structure of the components allows the system to be modified to handle different imaging devices by swapping out components.

Like the Suzuki reference, the Sieffert reference makes no mention of a system wherein the GUI code is maintained independent of the printer operating code by way of separate modules, thereby allowing a user to modify one code without negatively affecting the other code. In fact, the Sieffert reference makes no mention of GUI code whatsoever. Furthermore, like the Suzuki reference, the Sieffert reference makes no mention of a third independent module that includes a list of conflicts, such that the system may display a conflict from the list on the GUI in response to a predetermined condition.

Applicants note that the independently modifiable modules required by the pending claims of the present application provide for a novel and non-obvious advance over the prior art of record and, in particular, provide a data management system having improved functionality and flexibility, while reducing material and labor costs associated with updating and modifying the system.

Accordingly, it is submitted that the Examiner's proposed combination of the Suzuki reference with the Sieffert reference does not teach each and every limitation of the pending claims of the present application, including the limitations requiring (1) independently modifiable modules and (2) a conflict dialog module including a list of conflicts. *See* MPEP § 2143.03.

Furthermore, it is submitted that a person skilled in the art of printing systems would not be motivated to make the Examiner's proposed combination of the Suzuki and Sieffert references because a person skilled in the art of printing systems would not look to a reference directed to medical imaging technology (i.e., the Sieffert reference) when seeking to improve upon printing technology. *See* MPEP § 2143.01.

Still furthermore, even if the Examiner's proposed combination of the Suzuki and Sieffert references is made, resulting in a combination of two separate and distinct technologies (i.e., printing systems and medical imaging), there is no indication in the prior art of record that the selected features of the Sieffert reference are compatible with the print system taught by the Suzuki reference. Therefore, Applicants submit that there is no reasonable expectation that the Examiner's proposed combination of the Suzuki and Sieffert references would be successful, let

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alone arrive at the data management system disclosed and claimed in the present application.
See MPEP § 2134.02.

Therefore, it is submitted that the Office action fails to establish a *prima facie* case of obviousness and withdrawal of the rejections of claims 1-36 is respectfully requested.

Applicants hereby authorize the Commissioner under 37 C.F.R. § 1.136(a)(3) to treat any paper that is filed in this application, which requires an extension of time, as incorporating a request for such an extension. The Commissioner is authorized to charge any fees required by this paper or to credit any overpayment to Deposit Account No. 20-0809.

Respectfully submitted,



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